



1 J. Stephen Roberts, Jr.  
2 10 North Post Street, Suite 700  
3 Spokane, Washington 99201  
4 509.624.7606  
5 Attorney for John I. Sanger

6 United States District Court  
7 Eastern District of Washington  
Honorable James A. Goeke

8 United States of America,

No. 2:22-cr-0052-TOR-1

9 Plaintiff,

**Unopposed Motion for  
Furlough**

10 v.

11 John I. Sanger,  
12 Defendant.

13 Spokane — Without Argument

14 **September 8, 2022 at 6:30 p.m.**

1       Mr. Sanger respectfully requests the Court grant a furlough for him to  
2 participate in psychological evaluation at the U.S. District Courthouse at 920 West  
3 Riverside Avenue, Spokane, WA 99201 on **September 19 and 20, 2022**. U.S.  
4 Marshal Action is required, and it is requested that Mr. Sanger be brought over on  
5 the daily transport between the hours of 9:00 a.m. to 4:00 p.m. on September 19,  
6 2022; and again, on September 20, 2022 from 9:00 a.m. to 12:00 p.m. (noon).  
7 Release from imprisonment for a limited time to meet with the defense expert is  
8 necessary and cannot be accomplished at the jail. Undersigned counsel attempted to  
9 schedule the contact room at the room which is unavailable (and is only available  
10 twice a week for limited amounts of time). Given that the evaluation and testing may  
11 last several hours, visitation through the professional booth (i.e., behind the glass) is  
12 also not practicable or appropriate.

13       Mr. Sanger has been in pretrial detention at the Spokane County Jail on a U.S.  
14 Marshal hold since April 27, 2022. He waived his detention hearing and the United  
15 States' Motion for Detention was granted on the same date. *See* ECF Nos. 7, 11. The  
16 defense intends to file a motion to reopen after the evaluation.

17       Undersigned counsel also contacted the Clerk's Office in Spokane to  
18 determine whether the jury assembly room at the U.S. District Court is available on  
19 September 19 and 20, 2022 – to be utilized for purposes of the evaluation. The

1 Clerk's Office advised the Jury Assembly is available and reserved for Mr. Sanger on  
2 September 19, 2022 from 9:00 a.m. to 4:00 p.m.; and again on September 20, 2022  
3 from 9:00 a.m. to 12:00 p.m.

4 Undersigned counsel also confirmed with Supervisory Deputy U.S. Marshal  
5 Ben Haraseth that Mr. Sanger would be transported from the jail to courthouse by  
6 the U.S. Marshals Service. Mr. Sanger would then be released to the assigned case  
7 investigator from the Federal Defenders' Office. The Federal Defenders' Office  
8 case investigator would then assume custody and watch over Mr. Sanger and alert  
9 the U.S. Marshals when the evaluation is completed and return him to U.S. Marshal  
10 custody. This plan would reasonably assure safety to the community.

11 Assistant United States Attorney Patrick Cashman was contacted on  
12 September 7, 2022, in regard to the Motion and advised the United States does not  
13 oppose the motion. Mr. Sanger respectfully requests the Court grant him a furlough  
14 to the U.S. District Courthouse at 920 West Riverside Avenue, Spokane, WA 99201  
15 on **September 19, 2022** from 9:00 a.m. to 4:00 p.m.; and again from **September 20,**  
16 **2022** from 9:00 a.m. to 12:00 p.m.

17 Dated: September 8, 2022

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Federal Defenders of Eastern Washington & Idaho  
Attorneys for John I. Sanger

/s/ J. Stephen Roberts, Jr.

J. Stephen Roberts, Jr., WA45825  
Federal Defenders of  
Eastern Washington and Idaho  
10 N Post Suite 700  
Spokane, Washington 99201  
(509) 624-7606  
Email: Steve\_Roberts@fd.org

## SERVICE CERTIFICATE

I certify that on September 8, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System, which will notify Assistant United States Attorney Patrick Cashman.

/s/ J. Stephen Roberts, Jr.

J. Stephen Roberts, Jr., WA45825  
Federal Defenders of  
Eastern Washington and Idaho  
10 N Post Suite 700  
Spokane, Washington 99201  
(509) 624-7606  
Email: Steve Roberts@fd.org